IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS MIDLAND-ODESSA DIVISION

COBBLESTONE WIRELESS, LLC,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 7:24-cv-00232-ADA

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the Court's Scheduling Order (Dkt. 23), the Parties submit this Joint Claim Construction Statement. The claim terms identified below as being in dispute are found in U.S. Patent No. 8,891,347 (Dkt. 1-1).

LIST OF DISPUTED TERMS¹

	Claim Term	Claims	Cobblestone's Proposed Construction	Apple's Proposed Construction
1.	"predistorted" [Apple Term]	'347 Patent Claim 19	Plain and ordinary meaning, which excludes distortion after transmission	"distorted before transmission, not including precoding using a codebook"
2.	"path parameter information" [Apple Term]	'347 Patent Claims 19-22	Plain and ordinary meaning	"estimated parameters of the propagation path, excluding simplified representations of a channel (e.g. in terms of a codebook)"

¹ Cobblestone initially proposed "[first/second] center frequency" from the '802 Patent for construction but has withdrawn that term.

Dated: June 30, 2025

By: /s/ Reza Mirzaie

Reza Mirzaie

CA State Bar No. 246953

Marc A. Fenster

CA State Bar No. 181067

Neil A. Rubin

CA State Bar No. 250761

Christian W. Conkle

CA State Bar No. 306374

Jonathan Ma

CA State Bar No. 312773

Jacob R. Buczko

CA State Bar No. 269408

Peter Tong

TX State Bar No. 24119042

Matthew D. Aichele

VA State Bar No. 77821

RUSS AUGUST & KABAT

12424 Wilshire Boulevard, 12th Floor

Los Angeles, CA 90025 Telephone: 310-826-7474 Email: rmirzaie@raklaw.com

Email: mfenster@raklaw.com

Email: nrubin@raklaw.com Email: cconkle@raklaw.com

Email: jma@raklaw.com

Email: jbuczko@raklaw.com Email: ptong@raklaw.com

Email: maichele@raklaw.com

Attorneys for Plaintiff Cobblestone Wireless LLC

Respectfully submitted,

By: <u>/s/ Kevin J Post</u>

Steven J. Wingard

Texas Bar No. 00788694

Robert ("Robby") P. Earle

Texas Bar No. 24124566

Stephen L. Burbank

Texas Bar No. 24106972

SCOTT DOUGLASS & MCCONNICO LLP

303 Colorado Street, Suite 2400

Austin, Texas 78701

Telephone: 512.495.6300

Facsimile: 512.495.6399

Email: swingard@scottdoug.com Email: rearle@scottdoug.com Email: sburbank@scottdoug.com

James R. Batchelder

CA Bar No. 136347

Raivo H. Andrian

CA Bar No. 359257

ROPES & GRAY LLP

525 University Avenue, 8th Floor

Palo Alto, CA 94301-1922

Telephone: (650) 617-4000

Facsimile: (650) 617-4090

James.Batchelder@ropesgray.com Raivo.Andrian@ropesgray.com

Steven Pepe

NY Bar No. 2810430

Kevin J. Post

NY Bar No. 4382214

Alexander E. Middleton

NY Bar No. 4797114

Cassandra B. Roth

NY Bar No. 5287362

Lance W. Shapiro

NY Bar No. 5497955

Abed R. Balbaky

NY Bar No. 5844873

Brian P. Lebow

NY Bar No. 5992573

ROPES & GRAY LLP

1211 Avenue of the Americas
New York, NY 10036-8704
Telephone: (212) 596-9000
Facsimile: (212) 596-9090
Steven.Pepe@ropesgray.com
Kevin.Post@ropesgray.com
Alexander.Middleton@ropesgray.com
Cassandra.Roth@ropesgray.com
Lance.Shapiro@ropesgray.com
Abed.Balbaky@ropesgray.com
Brian.Lebow@ropesgray.com

Attorneys for Defendant Apple Inc.

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served this June 30, 2025 with a copy of this document via the Court's CM/ECF System.

/s/ Reza Mirzaie